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April 3, 2020

Via ECF

The Honorable Ronnie Abrams, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: LAWRENCE YOUNG, ON BEHALF OF HIMSELF AND ALL OTHER
PERSONS SIMILARLY SITUATED V. ARGOS INN, INC.,
Docket No.: 19-cv-9240-RA

Dear Judge Abrams:

This firm represents the Defendant in this matter. Pursuant to your Honor's Individual Rule 1(d), we respectfully move for a) an extension of time to answer, move or otherwise appear with regard to the Complaint filed in this action until June 9, 2020; and b) to adjourn the Initial Conference set for April 17, 2020 to a date beyond June 9, 2020, or to any date convenient to the Court.

The COVID-19 pandemic has placed hardships upon the defendant in that the defendant's business (a small hotel located in Tomkins County, New York) has essentially shut down. In addition, our firm and support staff are operating on a limited remote system. Defendant therefore respectfully requests this adjournment.

Preliminary settlement discussions with the plaintiff's attorney have been initiated.

We have the consent of plaintiff's attorney Darryn G. Solotoff, Esq. for both of these applications.

This is the third request for this application. The first two (2) requests were granted by this Court. If this request is granted, the adjournment will not affect any other dates or deadlines.

Thank you for permitting me to address the Court in this matter.

Respectfully submitted,

s/Daniel J. Solinsky
Daniel J. Solinsky

DJS/ds
561568

CC: Via ECF
Law Office of Darryn G. Solotoff
Attorneys for Plaintiff

Application granted. Defendant shall respond to the complaint no later than June 9, 2020. The initial conference scheduled for April 17, 2020 is hereby adjourned to June 19, 2020 at 2:00 p.m. The joint letter and proposed case management plan shall be filed no later than June 12, 2020.

SO ORDERED.



Hon. Ronnie Abrams
4/6/2020